

EMPLOYEE PRIVACY NOTICE ABLOY OY

SUMMARY OF HR EMPLOYEE NOTICE ON DATA PROCESSING

We, as the ABLOY OY entity with which you have your employment contract (hereafter "We", "ABLOY", "Us", or "Our") provide this summary notice (hereafter "Summary Notice") of the accompanying, detailed employee privacy notice (hereafter "Full Notice") on data processing to you in order to give you an overview of Our practices with respect to the collection, storage, use, disclosure or erasure (hereafter jointly "Process or Processing") of information of any kind (e.g., your name, address, salary, performance, certain health information and religious affiliation etc.) related to you or related to your spouse, domestic partner or dependents ("Dependents"), as the case may be (hereafter jointly "Personal Data") in connection with your work for Us. Each time We use a technical term taken from the applicable privacy laws and regulations We shall explain in parentheses first (as shown above) and then continue using the defined term with the defined meaning, and shall mark statements only applicable to the extent admissible or required in your jurisdiction with "*". You can review the Full Notice and a list of all defined terms with more details on their respective meanings below or by clicking [here](#).

Scope of applicability

This Summary Notice applies to you if you are a current full or part-time employee of ABLOY. Please be aware that some local law specific addition might be found at the end of the Privacy Notice.

Processing of your Personal Data (categories of Personal Data)

We Process the following of your Personal Data collected during the application and job interview process and in the course of your employment from yourself, your supervisor or authorized third parties (i.e., recruitment agencies, referees and public authorities): Your name and other identification data, bank account details, information related to your job, health-related information*, religious affiliation*, salary and benefits, equity compensation, your use of company equipment and resources, your communications and their content*, your work performance, disciplinary actions taken against you. We also Process Personal Data on Dependents should you provide it. For more details see I. of the Full Notice or click [here](#).

Processing purposes

We Process Your Personal Data for the following purposes: administration of your employment relationship, providing payments and applicable benefits, managing your daily job activities, compliance with applicable laws and regulations as well as ABLOY policies and procedures, monitoring your job performance, security and fraud prevention, compliance with corporate financial responsibilities, audit requirements, cost and budgeting analysis and controls. For more details see II. of the Full Notice or click [here](#).

Legal justifications for the Processing of your Personal Data

One of the key privacy law requirements is that any Processing of Personal Data has to have a legal justification. We generally use the following legal justifications: the Processing is necessary for (i) the performance of the employment contract (Art. 6(1)(b) GDPR and the corresponding provisions in local data protection law for the employment relationship; "Contract Justification"), (ii) compliance with a legal obligation (Art. 6(1)(c) GDPR; "Legal Obligation Justification"), (iii) realizing a legitimate interest (Art. 6(1)(f) GDPR; "Legitimate Interest Justification"). For more details and the matching of purposes and corresponding legal justifications see III. of the Full Notice or click [here](#).

Data transfers and recipients and legal justification for such transfers

We transfer your Personal Data to other group companies and third parties (e.g., business partners, customers, benefits providers), certain acquiring or acquired entities, Our service providers, and, in accordance with applicable law, governmental authorities, courts, external advisors, and similar third parties, some of the aforementioned recipients located in jurisdictions outside the EU. For more details see IV. of the Full Notice or click [here](#).

Retention periods for and deletion of your Personal Data

Your Personal Data will be deleted once they aren't any longer needed for the purposes motivating their original collection or as required by applicable law. For more details see V. of the Full Notice or click [here](#).

Your statutory rights

As set forth by applicable law, you have a number of rights with regard to the Processing of your Personal Data, each as per the conditions defined in applicable law, such as the right to get access to your data, to get them corrected, erased or handed over. Please refer any of your questions to privacy@ablo.com . For more details see VI. of the Full Notice or click [here](#).

Changes of this Summary and the Detailed Privacy Notice as well as further notices

Both this summary and the detailed privacy notice are subject to change. You will be notified adequately of any such changes. Further, you will (1) be notified adequately through further relevant privacy notices (e.g., for specific purposes, systems used by ABLOY in case such is not covered by this summary and the detailed privacy notice and (2) find further information how we process Personal Data [here](#).

How to contact us

If you wish to exercise your data subject rights or if you have any other questions concerning this Notice, please address your request to the controller via privacy@ablo.com or via the HR Department of the ABLOY entity with which you have your employment contract.

For country-specific requirements and practices, please see the Country related changes, for Finland which ABLOY implements in compliance with Finnish law [here](#).

FULL NOTICE

I. Categories of Personal Data

We process normal Personal Data about you (hereinafter jointly "Employee Data") and certain special categories of Personal Data about you (hereinafter jointly "Sensitive Employee Data").

We process the following Employee Data about you:

- Your name, work address, company code, telephone numbers, User ID, Personal ID and email addresses and similar data about you (hereinafter jointly "Master Data");
- Your home address, private email address, citizenship, passport data, nationality, date of birth, country of birth, national insurance number, tax reference, and emergency contact details, CV data, bank account(s), information on prior employers, family members, family status, Dependents, license plate and similar data about you (hereinafter jointly "Further Identification Data");
- Job title and code, work location (including remote work location aligned with manager), board area, department, position level, employment contract (and amendments of such), working time, absence (to the extent not due to sickness), assigned tasks and projects, manager's name, business travel data, ethics and compliance training data, information related to talent management, start and end date, and reason for leaving and similar data about you (hereinafter jointly "Job Data");
- Your basic salary, bonus and commission entitlements, insurance benefits (including information about you and your dependents that we provide to the insurer), tax code, accrued salary information, and information relating to your pension, information relating to company loan, information relating to company credit cards, (if applicable) information relating to attachments of salary, information relating to capital-forming benefits and similar data about you (hereinafter jointly "Salary Data");
- Units of stock or directorships held, details of all restricted stock units or any other entitlement to shares of stock awarded, cancelled, exercised, vested, unvested or outstanding in your favor and similar data about you (hereinafter jointly "Equity Compensation Data");
- Computer usage information related to your use of company equipment, systems, and other resources including IP addresses and similar data about you (hereinafter jointly "Monitoring Data")*;
- Business Email content, business letter content, business documents, and business chat content and similar data about you (hereinafter jointly "Communication Data")*; and
- Performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, submissions regarding non-compliant behaviour, details of grievances, and any outcome and similar data about you (hereinafter jointly "Performance And Disciplinary Data").

In addition, We process the following Sensitive Employee Data about you:

- **number of sick days;**
- **information on work-related accidents;**
- **information on disability*;**
- **information on parental leave;** and
- **religious affiliation*.**

II. Processing purposes

We process your Personal Data to the extent permitted or required under applicable law, for the following purposes:

- Administering and providing compensation, including administering and providing payroll bonus, stock options and other applicable incentives (hereinafter jointly "Compensation-related Purposes");
- Administering and providing applicable benefits and other work-related allowances, including reporting of benefit entitlements and use (hereinafter jointly "Benefit-related Purposes");

- Administering the workforce, including managing work activities, providing performance evaluations and promotions, producing and maintaining corporate organization charts, matrix management, entity and intra-group-entity staffing and team management, managing and monitoring business travel, carrying out workforce analysis, conducting talent management and career development, leave management/approvals, providing references as requested, and administering ethics and compliance trainings (hereinafter jointly "Workforce Management-related Purposes");
- Complying with applicable laws and employment-related requirements along with the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws (hereinafter jointly "Regulatory-related Purposes");
- Monitoring and ensuring compliance with applicable ABLOY's procedures, including company whistleblowing hotline, physical/IT/network security, and internal investigations including compliance and anti-discrimination investigations (hereinafter jointly "Internal Compliance-related Purposes");
- Communicating with you, other employees, within the ASSA ABLOY group, and/or third parties (such as existing or potential business partners, suppliers, customers, end-customers or government officials; hereinafter jointly "Communication-related Purposes");
- Communicating with your designated contacts in case of an emergency (hereinafter jointly "Emergency Contact-related Purposes");
- Responding to and complying with requests and legal demands from regulators or other authorities in or outside of your home country (hereinafter jointly "Authority-related Purposes");
- Security and fraud prevention activities such as prevention of fraud, misuse of IT systems, or money laundering, physical security, IT and network security, or internal investigations (hereinafter jointly "Security and Fraud Prevention-related Purposes");
- Complying with corporate financial responsibilities, including audit requirements (both internal and external) and cost/budgeting analysis and control (hereinafter jointly "Finance and Audit-related Purposes"); and
- Supporting any claim or defence that the ASSA ABLOY group could face before any jurisdictional, and/or administrative authority, arbitration or mediation panel and to cooperate with – or to inform – law enforcement or regulatory authorities to the extent required by law (hereinafter jointly "Litigation-related Purposes").

III. Legal justification for the Processing of your Personal Data

Generally, the processing of your Employee Data and Sensitive Employee Data is necessary for the conclusion and/or performance of the employment contract with you. In general, you are required to provide your Personal Data, except in limited instances when we indicate that certain information is voluntary (e.g., in connection with employee satisfaction surveys). However, if you do not provide your Personal Data, the affected HR processes might be delayed or impossible.

Furthermore, ABLOY relies on the following legal justifications for the processing, of your Personal Data (Employee Data is set out in the first table below and Sensitive Employee Data is set out in the second table below):

EMPLOYEE DATA		
Processing Purposes	Categories of Employee Data Involved	Legal basis

Compensation-related Purposes	<ul style="list-style-type: none"> • Master Data • Further Identification Data • Job Data • Salary Data • Equity Compensation Data • Performance And Disciplinary Data 	<ul style="list-style-type: none"> • Contract Justification; • Legal Obligation Justification; or • Legitimate Interest Justification.
Benefit-related Purposes	<ul style="list-style-type: none"> • Master Data • Further Identification Data • Job Data • Salary Data • Performance And Disciplinary Data 	<ul style="list-style-type: none"> • Contract Justification
Workforce Management-related Purposes	<ul style="list-style-type: none"> • Master Data • Job Data • Salary Data • Communication Data* • Performance And Disciplinary Data 	<ul style="list-style-type: none"> • Contract Justification; or • Legitimate Interest Justification.
Regulatory-related Purposes	<ul style="list-style-type: none"> • Master Data • Further Identification Data • Job Data • Salary Data • Performance And Disciplinary Data 	<ul style="list-style-type: none"> • Contract Justification; • Legal Obligation Justification; or • Legitimate Interest Justification.
Internal Compliance-related Purposes	<ul style="list-style-type: none"> • Master Data • Job Data • Salary Data • Monitoring Data* • Communication Data* • Performance And Disciplinary Data 	<ul style="list-style-type: none"> • Contract Justification; • Legal Obligation Justification; or • Legitimate Interest Justification.
Communication-related Purposes	<ul style="list-style-type: none"> • Master Data • Job Data • Communication Data* 	<ul style="list-style-type: none"> • Contract Justification; • Legal Obligation Justification; or • Legitimate Interest Justification.
Emergency Contact-related Purposes	<ul style="list-style-type: none"> • Further Identification Data • Dependent Data 	<ul style="list-style-type: none"> • Legitimate Interest Justification; or • The processing is necessary in order to protect the vital interests of you or of another natural person (Art. 6(1)(d) GDPR).
Authority-related Purposes	<ul style="list-style-type: none"> • Master Data • Further Identification Data • Job Data • Salary Data • Equity Compensation Data • Monitoring Data* • Communication Data* • Performance And Disciplinary Data 	<ul style="list-style-type: none"> • Legal Obligation Justification; or • Legitimate Interest Justification.
Security and Fraud Prevention-related Purposes	<ul style="list-style-type: none"> • Master Data • Further Identification Data • Job Data 	<ul style="list-style-type: none"> • Legal Obligation Justification; or • Legitimate Interest Justification.

	<ul style="list-style-type: none"> • Monitoring Data* • Communication Data* • Performance And Disciplinary Data 	
Finance and Audit-related Purposes	<ul style="list-style-type: none"> • Master Data • Further Identification Data • Job Data • Salary Data • Equity Compensation Data • Monitoring Data* • Communication Data* • Performance And Disciplinary Data 	<ul style="list-style-type: none"> • Legal Obligation Justification; or • Legitimate Interest Justification.
Litigation-related Purposes	<ul style="list-style-type: none"> • Master Data • Further Identification Data • Job Data • Salary Data • Equity Compensation Data • Monitoring Data* • Communication Data* • Performance And Disciplinary Data 	<ul style="list-style-type: none"> • Legitimate Interest Justification.

SENSITIVE EMPLOYEE DATA		
Processing Purposes	Categories of Sensitive Employee Data Involved	Legal basis
Compensation-related Purposes	<ul style="list-style-type: none"> • Number of sick days; • information on maternity leave* • religious affiliation* • Information on work-related accidents • Information on disability* 	<ul style="list-style-type: none"> • The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of ABLOY or you in the field of employment and social security and social protection law (Art. 9(2)(b) GDPR and the corresponding provisions under local data protection law)
Workforce Management-related Purposes	<ul style="list-style-type: none"> • Number of sick days; • information on maternity leave* • Information on work-related accidents • Information on disability* 	
Regulatory-related Purposes	<ul style="list-style-type: none"> • Number of sick days; • information on maternity leave* • religious affiliation* • Information on work-related accidents • Information on disability* 	

Personal Data of your Dependents

If you provide Us with Personal Data about your Dependents please make sure (1) to inform them accordingly, including about their rights with respect to Our Processing of their Personal Data (Section VI below) and (2) that you may disclose their Personal Data to Us for the purposes mentioned herein. You should also obtain the consent of these individuals (unless you can provide such consent on their behalf) if such consent is required by law for the Processing of their Personal Data.

IV. Data transfers and recipients and legal justification for such transfers

1. Recipients

To other group companies: We transfer your Employee Data to other ASSA ABLOY [group companies](#), as permitted under applicable data privacy law pursuant to Art. 6 (1)(f) GDPR for the legitimate interests of ABLOY to facilitate internal communication and task management to other ASSA ABLOY group companies, group wide HR planning and administration (including adequate staffing, succession planning, forecasting and budgeting, investment decisions, training in connection with performance management, in connection with ASSA ABLOY group's matrix structure etc.) and to be able to fulfil the employment relationship within Our global structure (i.e., to facilitate global cooperation, communication and employee transfers within the ASSA ABLOY group).

Third parties: ABLOY and/or other ASSA ABLOY group companies may also transfer your data to governmental agencies and regulators (e.g. tax authorities), social insurance carriers, courts, and government authorities, all in accordance with applicable law based on Art. 6 (1) (c) GDPR and to external advisors acting as controllers (e.g., lawyers, accountants, auditors etc.) based on Art. 6 (1) (f) GDPR.

Service providers (within and outside the ASSA ABLOY group): ABLOY contracts with third party service providers or other ASSA ABLOY group companies as part of its normal business operations to carry out certain human resources-related or IT-related tasks, global HR management (i.e., global benefits, global payroll, global recruitment, provision of a global directory and cross-charging for salary and other compensation expenses among the ASSA ABLOY group companies that benefit from contributions by employees of ABLOY; to provide secure global systems and networks as a service provider to the companies in the ASSA ABLOY group where all or some ASSA ABLOY group companies can process Personal Data, including payroll and benefits information relating to their own employees).

When required by local law to process Sensitive Employee Data, then this information will only be transferred outside of your country if permitted by applicable law.

2. Cross-Border Data Transfers

We transfer your Personal Data outside of the country you are located. Some recipients of your Personal Data are located in another country for which the European Commission has not issued a decision that this country ensures an adequate level of data protection, namely: The U.S. or some of the locations of non-European ASSA ABLOY [group companies](#).

Some recipients located outside of the European Economic Area (“EEA”) are located in countries for which the European Commission has issued adequacy decisions. The transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective (Art. 45 GDPR).

By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses as referred to in Art. 46 (2)(c) GDPR or other adequate means, which are accessible via the contact details above we have established that all other recipients located outside the EEA will provide an adequate level of data protection for the Personal Data and that appropriate technical and organizational security measures are in place to protect

Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing. Any onward transfer (including Our affiliates outside the EEA) is subject to appropriate onward transfer requirements as required by applicable law.

V. Retention periods for and deletion of your Personal Data

Personal Data processed for the purposes hereunder will be stored only to the extent necessary during the term of your employment relationship with ABLOY, during a transition period (e.g., for the provision of ongoing pensions and other benefits, or the compliance of ABLOY's obligations regarding data retention as established in the applicable laws), or for purposes of documenting proper termination of the employment relationship (e.g., vis-à-vis tax authorities, etc.) as further set forth in the Document Retention Policy applicable to the entity with which you have your employment contract. If a judicial or disciplinary action is initiated, the Personal Data may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by applicable law.

In principle we will retain your Personal Data as long as required or permitted by applicable law, in particular as long as the data may be needed to fulfill or defend against claims that are not yet time-barred. Afterwards, we will remove your Personal Data from Our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it.

VI. Your statutory rights

Under the conditions set out under applicable law (i.e., the GDPR), you have the following rights:

1. **Right of access:** You have the right to obtain from Us confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, to request access to the Personal Data. The access information includes – inter alia – the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data have been or will be disclosed.

You have the right to obtain a copy of the Personal Data undergoing processing. For additional copies requested by you, we may charge a reasonable fee based on administrative costs.

2. **Right to rectification:** You have the right to obtain from Us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.
3. **Right to erasure (right to be forgotten):** You have the right to ask Us to erase your Personal Data.
4. **Right to restriction of processing:** You have the right to request the restriction of processing your Personal Data. In this case, the respective data will be marked and may only be processed by Us for certain purposes.
5. **Right to data portability:** You have the right to receive the Personal Data concerning you which you have provided to Us in a structured, commonly used and machine-readable format and you have the right to transmit those Personal Data to another entity without hindrance from us.
6. **Right to object:**

You have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data by us and we can be required to no longer process your Personal Data. If you have a right to object and you exercise this right, your Personal Data will no longer be processed for such purposes by us. Exercising this right will not incur any costs.

Such a right to object may not exist, in particular, if the processing of your Personal Data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

Please note that the aforementioned rights might be limited under the applicable national data protection law. ABLOY as your contractual employer remains the universal point of contact for your execution of these rights.

Please refer any of your questions to privacy@abloy.com.

In case of complaints you also have the right to lodge a complaint with the competent supervisory authority, in particular in the Member State of your habitual residence or alleged infringement of the GDPR.

GLOSSARY OF DEFINED TERMS

#	Term(s)	Meaning
1.	<u>Authority-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: responding to and complying with requests and legal demands from regulators or other authorities in or outside of your home country.
2.	<u>Benefit-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: administering and providing applicable benefits and other work-related allowances, including reporting of benefit entitlements and use.
3.	<u>Communication Data*</u>	shall mean email content, business letter content, business documents, and chat content and similar data about you.
4.	<u>Communication-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: communicating with you, other employees, within the ASSA ABLOY group, and/or third parties (such as existing or potential business partners, suppliers, customers, end-customers or government officials).
5.	<u>Compensation-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: administering and providing compensation, including administering and providing payroll bonus, stock options and other applicable incentives.
6.	<u>Contract Justification</u>	shall refer to the following legal justification: the Processing is necessary for the performance of the employment contract (Art. 6(1)(b) GDPR and the corresponding provisions in local data protection law for the employment relationship.
7.	<u>EEA</u>	shall mean the European Economic Area.
8.	<u>Emergency Contact-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: communicating with your designated contacts in case of an emergency.
9.	<u>Employee Data</u>	shall include Master Data, Further Identification Data, Job Data, Salary Data, Equity Compensation Data, Communication Data*, Monitoring Data*, Performance And Disciplinary Data.
10.	<u>Equity Compensation Data</u>	shall mean units of stock or directorships held, details of all restricted stock units or any other entitlement to shares of stock awarded, cancelled, exercised, vested, unvested or outstanding in your favor and similar data about you.
11.	<u>Finance and Audit-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: complying with corporate financial responsibilities, including audit requirements (both internal and external) and cost/budgeting analysis and control.
12.	<u>Full Notice</u>	shall mean the detailed notice on data processing provided to you in order to give you an overview of Our practices with respect to the Processing of Personal Data related to you.
13.	<u>Further Identification Data</u>	shall mean your home address, private email address, citizenship, passport data, nationality, date of birth, country of birth, national insurance number, tax reference, and emergency contact details, CV data, bank account(s), information on prior employers, family members, family status, license plate and similar data about you.
14.	<u>Internal Compliance-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: monitoring and ensuring compliance with applicable ABLOY procedures, including company whistleblowing hotline, physical/IT/network security, and internal investigations including compliance and anti-discrimination investigations.
15.	<u>Job Data</u>	shall mean job title and code, work location (including remote work location aligned with manager), division, department, position level, employment contract (and amendments of such), working time, absence (to the extent not due to sickness), assigned tasks and projects, manager's name, business travel data, ethics and compliance training data, information related to talent management, start and end date, and reason for leaving and similar data about you.
16.	<u>Legitimate Interest Justification</u>	shall refer to the following legal justification: the Processing is necessary for realizing a legitimate interest (Art. 6(1)(f) GDPR).
17.	<u>Legal Obligation Justification</u>	shall refer to the following legal justification: the Processing is necessary for compliance with a legal obligation (Art. 6(1)(c) GDPR).
18.	<u>Master Data</u>	shall mean your name, work address, telephone numbers, User ID, Personal ID and email addresses and similar data about you.
19.	Abloy Oy	shall mean the ABLOY entity being your contractual employer.
20.	<u>Monitoring Data*</u>	shall mean computer usage information related to your use of company equipment, systems, and other resources including IP addresses and similar data about you.
21.	<u>Our</u>	shall refer to the ABLOY entity being your contractual employer

22.	<u>Performance And Disciplinary Data</u>	shall mean performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances, and any outcome and similar data about you.
23.	<u>Personal Data</u>	shall include Employee Data and Sensitive Employee Data.
24.	<u>Processing</u>	shall mean the collection, storage, use, disclosure or erasure of Personal Data.
25.	<u>Regulatory-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: complying with applicable laws and employment-related requirements along with the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws.
26.	<u>Salary Data</u>	shall mean your basic salary, bonus and commission entitlements, insurance benefits (including information about you and your dependents that we provide to the insurer), tax code, accrued salary information, and information relating to your pension, information relating to company loan, information relating to company credit cards, (if applicable) information relating to attachments of salary, information relating to capital-forming benefits and similar data about you (hereinafter jointly "Salary Data");
27.	<u>Security and Fraud Prevention-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: security and fraud prevention activities such as prevention of fraud, misuse of IT systems, or money laundering, physical security, IT and network security, or internal investigations.
28.	<u>Sensitive Employee Data</u>	shall mean special categories of Personal Data about you (i.e., data that revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation).
29.	<u>Summary Notice</u>	shall mean the summary notice providing you an overview of the accompanying Full Notice on Our practices with respect to the Processing of Personal Data related to you.
30.	<u>Us</u>	shall refer to the ABLOY entity being your contractual employer.
31.	<u>We</u>	shall mean the ABLOY entity being your contractual employer.
32.	<u>Workforce Management-related Purposes</u>	shall refer to the following purposes for which ABLOY processes your Personal Data: administering the workforce, including managing work activities, providing performance evaluations and promotions, producing and maintaining corporate organization charts, matrix management, entity and intra-group-entity staffing and team management, managing and monitoring business travel, carrying out workforce analysis, conducting talent management and career development, leave management/approvals, providing references as requested, and administering ethics and compliance trainings.

COUNTRY RELATED CHANGES: FINLAND

Topic	Finland-specific clarification
Special categories of personal data	In Finland, ABLOY does not collect or process data relating to religious affiliation or disability. Where the main text refers to these categories, such references do not apply in Finland, in accordance with Finnish local law.
Special categories of personal data relating to spouse, domestic partner or dependents	ABLOY does not process special categories of personal data relating to your spouse, domestic partner or dependents in Finland, including data concerning religious affiliation, health or disability. Any references to such data in this privacy notice do not apply in Finland, in accordance with Finnish local law.
Parental leave terminology	In Finland, the term “parental leave” is used (not “maternal/maternity leave”). All references to maternity/maternal leave in the main text are understood and applied in Finland as “parental leave”, in line with Finnish local law and practice.
Monitoring (Monitoring Data): general principles	Employee monitoring in Finland is limited and must be necessary, proportionate, and lawful under Finnish local law. ABLOY focuses primarily on technical logs and security events (e.g., logins/logoffs, endpoint security events, system anomalies). Content-level monitoring is not part of routine monitoring.
Legal basis and purposes for monitoring	Monitoring is carried out only for clearly defined purposes and only as permitted by Finnish local law, such as ensuring information security, preventing and investigating misconduct, and complying with legal obligations. The legal basis is typically a legal obligation or legitimate interest, assessed with proportionality and data minimization in mind, and documented in accordance with Finnish requirements.
Communication Data: content vs. metadata	In most cases, processing is limited to communication metadata and logs (e.g., time of sending/receiving, sender/recipient within company systems). Access to the content of communications is exceptional and occurs only in legally permitted, narrowly defined situations (e.g., a specific IT security incident, a legal request, or an internal investigation) and strictly in compliance with Finnish local law.
Occupational health data	In Finland, occupational health care providers primarily process medical data as independent controllers. ABLOY does not receive diagnoses or detailed medical records; it receives only necessary fitness-for-work statements and legally required certificates, in accordance with Finnish local law.

RECIPIENTS OF EMPLOYEE PERSONAL DATA - FINLAND

The table below groups the recipients of employee personal data in Finland and the purposes for which such data may be disclosed.

Recipient category	Recipient	Purpose of disclosure
Intra-group (ASSA ABLOY)	ASSA ABLOY Group entities	Executive compensation information and enhanced HR reporting needs
Intra-group (ASSA ABLOY)	ASSA ABLOY Group internal phone directory	Internal communications within the Group
Public authorities and regulators	Tax Administration (Verohallinto)	Administration and assessment of taxes
Public authorities and regulators	Social Insurance Institution (Kela)	Payment of sickness, parental leave and other statutory benefits
Public authorities and regulators	Enforcement Authority/Bailiff Offices (Ulosottovirastot)	Processing and remittance of court-ordered garnishments
Public authorities and regulators	Employment Services (TE-palvelut)	Notifications related to layoffs and similar arrangements
Public authorities and regulators	Occupational Safety Authority (Työsuojeluviranomainen)	Provision of inspection records and compliance documentation
Social partners	Trade unions (Ammattiliitot)	Collection and remittance of union membership fees (where applicable)
Insurance and pensions	Insurance broker (Vakuutusmeklari)	Administration and placement of corporate insurance policies
Insurance and pensions	Insurance companies (Vakuutusyhtiöt)	Calculation of statutory earnings-related pensions and processing of accident insurance claims
Occupational health and safety	Occupational health care provider (Työterveyshuolto)	Maintenance and provision of occupational health services

Occupational health and safety	Finnish Institute of Occupational Health (Työterveyslaitos)	Reporting to ASA register (exposure to carcinogenic agents) as required
Security and facilities	Security services provider (Vartiointipalvelut)	Premises protection and facilities security management
HR, payroll, and benefits service providers	Payroll service provider (SD Worx)	Payroll calculation and related payroll administration services
HR, payroll, and benefits service providers	e-Payslip operator (Verkkopalkkalaskelmaoperaattori)	Delivery of electronic payslips to employees
HR, payroll, and benefits service providers	IT service providers (Palveluntarjoajat)	Maintenance and support for HR/IT systems and infrastructure
HR, payroll, and benefits service providers	Employee gifts provider (Henkilöstölahjojen palveluntarjoaja)	Administration and delivery of employee recognition gifts
HR, payroll, and benefits service providers	Sports and culture benefit administrator (Liikunta- ja kulttuuriedun hallinnoija)	Administration of employee fringe benefits
Communications and connectivity	Telecommunications operator (Puhelinoperaattori)	Mobile, switchboard and internet connectivity services
Travel and expenses	Travel agency (Matkatoimisto)	Business travel bookings and related invoicing
Learning and development	Training provider (Koulutuspalveluiden toimittaja)	Delivery and administration of employee trainings
Intellectual property	Patent attorney/firm (Patenttitoimisto)	Handling of employee invention disclosures and IP filings
Statistics and industry bodies	Statistics Finland (Tilastokeskus)	Mandatory statistical reporting
Statistics and industry bodies	Confederation of Finnish Industries (Elinkeinoelämän keskusliitto, EK)	Statistical reporting and industry surveys